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MAY 23 2003 DJ

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

CV 03-00571 #00000014

UNITED STATE DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

NO C03-571 P

vs

ANSWER OF SECURED CREDITOR
FLORENCE S STONE

REAL PROPERTY LOCATED AT 29635 11th
AVENUE SW, FEDERAL WAY, WASHINGTON
98023, its Buildings, Improvements, Appurtances,
Fixtures, Attachments, and Easements

Defendant

COMES NOW the secured party in interest in the above referenced property FLORENCE S
STONE, and by way of answer to the Complaint, states and alleges as follows

I. ANSWER TO COMPLAINT

1 1 Answering Paragraphs I , II, III, IV, V, VI, VI, VII and VIII of Plaintiff's complaint,
22 secured party in interest FLORENCE S STONE is without sufficient information or belief, and
23 therefore denies the same.

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II. AFFIRMATIVE DEFENSES

Having answered Plaintiff's Complaint, secured party in interest FLORENCE S STONE now asserts the following affirmative defenses:

2 1 Plaintiffs claims against the property, if any, are inferior to the secured interest of FLORENCE S STONE recorded on November 30, 2001 under King County Auditor's recording number 20011130003406

III. COUNTER-CLAIM

COMES NOW the secured party in interest FLORENCE S. STONE, and by way of counter-claim against the Plaintiff alleges as follows

3 1 Secured party in interest, FLORENCE S STONE, is an individual and resident of King County, Washington

3 2 On November 30, 2001 secured Party in interest FLORENCE S STONE loaned LISA ROBERTS \$85,000 00 secured by a promissory note and deed of trust against the property at issue herein in good faith and without knowledge of any alleged illegal activities conducted on the property

3 3 Said deed of trust was recorded against the property herein on November 30, 2001 under King County Auditor's recording No 20011130003406 and should have priority of payment as against any subsequent lien holders of interest including the plaintiff herein

IV. PRAYER FOR RELIEF

WHEREFORE, Secured party in interest FLORENCE S STONE prays for the following relief

a That FLORENCE S STONE be granted leave to conduct a non-judicial foreclosure of the property to protect her interest in the property in accordance with Washington State law,

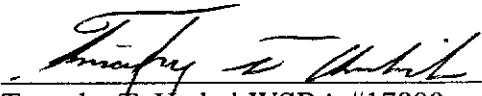
b In the alternative, that the court establish a priority of payment of the liens based upon the date of the recorded interest of the various liens against the property and that the proceeds of any

1 forfeiture action go first to pay said liens in the order in which they were recorded against the
2 property,

3 c For all of secured party in interest FLORENCE S STONE'S costs and reasonable
4 attorney's fees, and

5 d For such other and further relief as the Court deems fair and equitable

6 DATED May 20, 2003

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8 
9 Timothy T. Hickel WSBA #17899
10 of PAYNE & HICKEL
11 Attorneys for FLORENCE S STONE
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WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

NO C03-571 P

vs

CERTIFICATE OF SERVICE

REAL PROPERTY LOCATED AT 29635 11th
AVENUE SW, FEDERAL WAY, WASHINGTON
98023, its Buildings, Improvements, Appurtenances,
Fixtures, Attachments, and Easements,

Defendant

The undersigned declares as follows That I am over the age of 18 years, a resident of the
State of Washington and not a party hereto

I hereby certify under penalty of perjury that I delivered this day by way of legal messenger
this document to the following

DOCUMENT ANSWER OF SECURED CREDITOR FLORENCE S STONE

ORIGINAL TO Clerk of the Court
United States District Court
Western District of Washington
1010 Fifth Avenue, Room 215
U S Courthouse
Seattle, WA 98104

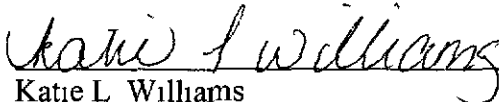
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DECLARATION OF MAILING
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1 COPY TO. Richard E. Cohen
2 Assistant United States Attorney
3 601 Union Street, Suite 5100
4 Seattle, WA 98101

5 DATED. May 22, 2003

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7 Katie L. Williams
8 Legal Assistant
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